

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Christopher M. Mattis, Sr.
Linda L. Mattis,
Debtors,

Chapter 13

Case No. 20-11261-amc

Select Portfolio Servicing, Inc.,
Creditor,

Christopher M. Mattis, Sr. and Linda L. Mattis,
Debtors / Respondents,

and
Scott F. Waterman,
Trustee / Respondent

**NOTICE OF DEBTORS' REQUEST FOR FORBEARANCE
DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor, Select Portfolio Servicing, Inc. ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtors' request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtors recently contacted Creditor requesting a forbearance period of 3 months and have elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 02/01/2021 through 04/30/2021. Creditor holds a secured interest in real property commonly known as 63 IVY HILL RD, LEVITTOWN, PA 19057 as evidenced by claim number 6-1 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtors desire to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtors or Counsel for the Debtors make those requests through undersigned counsel.

Per the request, Debtors will resume Mortgage payments beginning 05/01/2021 and will be required to cure the delinquency created by the forbearance period (hereinafter "forbearance arrears").

Creditor has retained undersigned counsel to seek an agreement with Debtors regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtors fail to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Date: April 28, 2021

Respectfully submitted,
MILSTEAD & ASSOCIATES, LLC

/s/Andrew M. Lubin
Andrew M. Lubin, Esquire
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(856) 482-1400
Attorneys for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Christopher M. Mattis, Sr.
Linda L. Mattis,
Debtors,

Bankruptcy No. 20-11261-amc
Chapter 13

Select Portfolio Servicing, Inc.,
Secured Creditor,

Christopher M. Mattis, Sr. and Linda L. Mattis,
Debtors / Respondents,

and
Scott F. Waterman,
Trustee / Respondent.

CERTIFICATION OF SERVICE

Andrew M. Lubin, Esquire counsel for Select Portfolio Servicing, Inc., hereby certifies that a copy of the Notice of Debtors' Request for Forbearance Due To The COVID-19 Pandemic was served upon the following persons via electronic transmission or by regular first-class mail, postage pre-paid on April 28, 2021, addressed as follows:

Scott F. Waterman, Trustee Chapter 13 Trustee 2901 St. Lawrence Ave. Suite 100 Reading, PA 19606 <i>via electronic transmission</i>	Brad J. Sadek Sadek and Cooper 1315 Walnut Street Suite 502 Philadelphia, PA 19107 <i>via electronic transmission and regular mail</i>
Christopher M. Mattis, Sr. 63 Ivy Hill Road Levittown, PA 19057 <i>via regular mail</i>	Linda L. Mattis 63 Ivy Hill Road Levittown, PA 19057 <i>via regular mail</i>

MILSTEAD & ASSOCIATES, LLC

DATED: April 28, 2021

By: /s/Andrew M. Lubin
Andrew M. Lubin, Esquire
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1 E. Stow Road
Marlton, NJ 08053
(856) 482-1400
Attorneys for Secured Creditor